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May 16, 2000

Lyndon Jones Cargill Salt 15100 West Rowley Road P.O. Box 648 Grantsville, Utah 84029

Re: <u>Tentative Approval of Notice of Intention to Commence Large Mining Operations</u>, <u>Cargill Mining Company</u>, <u>Timpie Solar Ponds</u>, <u>M/045/030</u>, <u>Tooele County</u>, <u>Utah</u>

Dear Mr. Jones:

The Division has completed a third review of your Notice of Intention to Commence Large Mining Operations for the Timpie Solar Ponds, located in Tooele County, Utah, which was received in various parts February 29th, Mar 14th, and Mar 23rd of 2000. This response was to address the Division's review comments found in our review letter of October 2, 1998. On August 19, 1999 we held a meeting to discuss the remaining permitting requirements to complete Cargill's approval of a Large Mining Operation. This meeting helped explain the Division's needs.

The Division has revised the reclamation cost estimate using the information provided in this latest submission. Most of the unit costs in the 1998 draft estimate and escalation rate have also been updated in this revised estimate (copy attached). The amount of reclamation surety estimated by the Division for the Timpie Solar Ponds operation is \$1,919,000 in year 2005 dollars. Please review this estimate for accuracy. We currently hold a \$109,500 surety. You may have your surety company issue a rider for the new amount, or if you choose to post another type of surety please inform us so we can provide you with the correct form.

Your response has addressed all our technical deficiencies. We will now prepare to publish a formal notice of tentative approval for this project in the local and Salt Lake area newspapers. When published, this action will begin a 30-day public comment period. If no adverse comments are received during the comment period, we will be prepared to issue final approval for this project. A complete reclamation contract agreement (FORM MR-RC) and final reclamation surety amount must be received before we can grant final approval. Please

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provide the MR-RC in a "draft" form so we can check it for completeness and accuracy before it is finalized. If you post a different form of surety other than a rider, we also request that you provide the surety in a "draft" form for our review before finalizing.

If you have any questions regarding this letter please contact me, Tony Gallegos, or Tom Munson of the Minerals Staff. If you wish to arrange a meeting to sit down and discuss this review, please contact us at your earliest convenience. Thank you for your cooperation in completing this permitting action.

Sincerely,

D. Wayne Hedberg

Permit Supervisor

Minerals Regulatory Program

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Attachment: Reclamation Surety Estimate 4/28/00, MR-RC

Cheryl Martinez, BLM, Salt Lake FO

John Blake, SITLA

M45-30-rvw

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1	RECLAMATION SURETY ESTIMA	last revision	28-Apr-2000				\Box
2	Cargill Salt Division			-			
3	Timpie Solar Ponds			page "ESTIMATE"			
4	M/045/030	Tooele County		filename m45-30.wi	12		
	Prepared by Utah State Division of Oil, Gas & Mini	•			, .		
5	-North dike(s) to remain to protect I-80 from flooding - POS					·	-
6	-Dikes protecting Timpie Waterfowl Area to remain in place	A POSTMINE LISE					
7	-All other dikes will be allowed to erode naturally without re						
8	-All wooden gates in dikes to be left open & allowed to eroc						
10	-Two concrete gates in the dike system to be removed.	ze naturany.					
11	-PLOT A: vehicle maintenance bldg, parking area, fuel stor	ane & utility lines rer	noved/recla	imed	3.20 á	acres	
12	-PLOT B: warehouse, offices, outside & bag storage, scale, pump station & RR spur removed/reclaime				11.61 8		
13	-PLOT C: stacker conveyor, N & S salt stockpiles, ramp & roads removed/reclaimed				29.64 acres		
14	-PLOT D: salt washing plant, ramp & roads removed/reclaimed				4.80 acres		
15	-PLOT F: ramp & roads removed/reclaimed				1.60 acres		
16	-PLOT E: UP&L Substation reclamation is NOT the responsibility of Cargill(0.964 acres)				0.00 acres		
17	-Disturbed acreage for facilities site ONLY (does not include pond system & dikes) =				50.85	acres	
18	-ASSUME soil needed from borrow site B to cover Plot C &		31.24	acre			
19	-Volume of topoil needed from borrow site B (12" cover) =		50,401	CY			
20	-ASSUME soil at borrow areas is 24" deep, then borrow ac	reage needed =			12.6 8	acres	
21	-Total disturbance to be reclaimed (facilities site + borrow area) = 63.45 acres						
22	-Most man hrs, equipment hrs, & quantities are based on Cargill's figures; unit costs have been updated by the Division.						
23	-Refer to Salt Washing Pland & Related Facilities map received 3/14/00 for "PLOT" descriptions.						
24	-Estimated total disturbed area for this mine = 63.5 acres						
25	Activity		Quantity	<u>Units</u>	\$/unit	\$	Note
26							
27	open all gates			gates	77	1,848	(1)
28	remove concrete gates			gates	2,760	5,520	(2)
29	demo/remove wash plant - Plot D			sum	36,446	36,446	(3)
30	demo/remove stacker, conveyor, rail & pipeline			sum	40,348	40,348	(4)
31	rip & remove salt stockpiles in Plot C		1	sum	55,628	55,628	(5)
32	Demanda facturas in Dist E		16	0010	220	541	(e)
33	Regrade features in Plot F		1.0	acre	338	541	(6)
34 35	Demolition of buildings & facilities - Plot A & B		1.296.000	CE	0.24	311,040	(7)
36	Debris & equipment removal - trucking			trips	40	20,000	(8)
37	Debris & equipment removal - dump fees		20,000		9	180,000	(9)
38	Debris & equipment removal - FE loader		•	wks	5,520	35,880	(10)
39	Demolition & debris removal - general labor		10,000	hours	15	150,000	(11)
40	Regrading facilities areas - 50% of (Plot A + B)		•	acre	338	2,503	(6)
41	.5 5		•		_	, -	
42	Topsoil replacement - truck haulage, 7mi one-way		50,401	CY	11.55	582,126	(12)
43	Topsoil replacement - FE loader		50,401		0.46	23,184	
44	Topsoil regrading/spreading - dozer		50,401	CY	0.33	16,632	(6)
45							
46	Drill seeding (~13 lb/acre) - all facilities reclaimed area			acre	170	8,645	(00)
47	Drill seeding (~13 lb/acre) - borrow area		12.6	acre	170	2,142	(00)
48			^- ·			4 00.	(0.1)
49	General site cleanup & trash removal - 50% facilites area		25.4	acre [′]	50	1,271	(01)
50	Equipment mobilization/EE leader dever grane 2 totals		e	oguin	1,000	6 000	(02)
51	Equipment mobilization(FE loader, dozer, crane, 3 trucks)		0	equip	1,000	6,000	(02)
52	Reclamation Supervision		ρ	weeks	1,930	15,440	(14)
53 54	Tresianation Supervision		O	Subtotal	1,830	1,495,194	` ' ' '
55	10% Contingency					149,519	
56	, to the same of t			Subtotal		\$1,644,713	1
57	Escalate for 5 years at 3.13% per yr					274,023	
58	, , ,			Total		\$1,918,736]
59	Rounded surety amount in yr 2005-\$ \$1,919,000						
60	Average cost per disturbed acre =		\$30,244				